

Exhibit # 1
Page 1

Annamarie Trombetta
175 East 96 th Street (12 R)
New York, New York 10128
Tel. (212) 427 - 5990
Email atrombettaart@gmail.com

October 20, 2022

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
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150 East 42nd Street White Plains, New York 10604
New York New York. 10017

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Attorneys for Defendants
Norb Novocin, Marie Novocin
and Estate Auctions, Inc.
43-10 Crescent St. Ste. 1217
Long Island City, NY 11101
(646) 450-3607

Plaintiff's August 30, 2022 Deposition Responses

Attached is the listing of Plaintiff's Deposition Responses and numbered evidence.

Below is the Production of email from WorthPoint to trombettaart@yahoo.com
and from Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.com
DATE January 22, 2016.

Plaintiff's Deposition Response Plaintiff's Evidence 000351

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address
support@worthpoint.com with seven questions regarding 1972 Original Oil Man With
Red Umbrella.

Plaintiff's Deposition Response Plaintiff's Evidence 000352

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address
support@worthpoint.com Page 2 to include WorthPoint Membership details.

Plaintiff's Deposition Response Plaintiff's Evidence 000353

Production of January 22, 2016 Plaintiff's 2016 Membership to WorthPoint.com Page 3

Plaintiff's Deposition Response Plaintiff's Evidence 000354

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address
support@worthpoint.com and membership to WorthPoint.com Meta Data of email

Plaintiff's Deposition Response Plaintiff's Evidence 000355

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address
support@worthpoint.com and membership to WorthPoint.com Meta Data of email

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Page 2

Plaintiff's Deposition Response Plaintiff's Evidence 000356

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com and membership to WorthPoint.com Meta Data of email

Plaintiff's Deposition Response Plaintiff's Evidence 000357

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com and membership to WorthPoint.com Meta Data of email

Plaintiff's Deposition Response Plaintiff's Evidence 000358

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com and membership to WorthPoint.com Meta Data of email

Plaintiff's Deposition Response Plaintiff's Evidence 000359

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com and membership to WorthPoint.com Meta Data of email

Below is the Production of email from WorthPoint to annamarie@trombettaart.com and from Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.com. PLEASE NOTE PLAINTIFF NEVER FURNISHED WORTHPOINT WITH MY WEBSITE EMAIL ADDRESS annamarie@trombettaart.com DATE January 22, 2016.

Plaintiff's Deposition Response Plaintiff's Evidence 000360

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com and membership to WorthPoint.com Meta Data of email

Plaintiff's Deposition Response Plaintiff's Evidence 000361

Production of January 22, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com and membership to WorthPoint.com Meta Data of email

Below is the Production of email from WorthPoint to trombettaart@yahoo.com and from Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.com DATE January 25, 2016.

Plaintiff's Deposition Response Plaintiff's Evidence 000362

Production of January 25, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com with seven questions regarding 1972 Original Oil Man With Red Umbrella. This is the second request to WorthPoint.com with No RESPONSE and that was NOT answered-Page 1.

Plaintiff's Deposition Response Plaintiff's Evidence 000362 Page 2

Production of January 25, 2016 Plaintiff's Email to WorthPoint using email address support@ worthpoint.com with seven questions regarding 1972 Original Oil Man With Red Umbrella. This is the second request to WorthPoint.com with No RESPONSE and that was NOT answered-Page 2.

Exhibit # 1

Page 3

Below is the Production of email from WorthPoint to trombettaart@yahoo.com to Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.desk-mail.com DATE January 22, 2016 issued Ticket #56607 by WorthPoint.com Subscription

Plaintiff's Deposition Response Plaintiff's Evidence 000363

Production of email from WorthPoint to trombettaart@yahoo.com to Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.desk-mail.com DATE January 22, 2016 issued Ticket #56607 by WorthPoint.com Subscription

Plaintiff's Deposition Response Plaintiff's Evidence 000364-Ticket #57565

Plaintiff's Evidence 000364 Fraudulent Artwork and links to Fraudulent Artwork. Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.desk-mail.com DATE February 20, 2016 issued Ticket #57565 from WorthPoint.com

Plaintiff's Deposition Response Plaintiff's Evidence 000364 Email Meta Data Page 1 Saturday February 20, 2016 email from WorthPoint Ticket #57565

Production of META DATA email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.desk-mail.com DATE February 20, 2016 issued Ticket #57565 from WorthPoint.com Page 1.

Plaintiff's Deposition Response Plaintiff's Evidence 000364 Email Meta Data Page 2 Saturday February 20, 2016 email from WorthPoint Ticket #57565

Production of META DATA email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint support@worthpoint.desk-mail.com DATE February 20, 2016 issued Ticket #57565 from WorthPoint.com Page 2.

Plaintiff's Deposition Response Plaintiff's Evidence 000365 Email to will@worthpoint.com and support@worthpoint.com February 20, 2016 Page 1.

Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint DATE February 20, 2016 email Page 1

Plaintiff's Deposition Response Plaintiff's Evidence 000365 META DATA Page 1. Page 1 Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint DATE February 20, 2016 META DATA FROM email Page 1.

Plaintiff's Deposition Response Plaintiff's Evidence 000366 Page 2 Email to will@worthpoint.com and support@worthpoint.com February 20, 2016 Page 2

Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint DATE February 20, 2016 email Page 2.

Plaintiff's Deposition Response Plaintiff's Evidence 000366 META DATA Page 2. Page 2 Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to WorthPoint DATE February 20, 2016 META DATA FROM email Page 2.

Plaintiff's Deposition Response Plaintiff's Evidence 000367 Page 3. Email to will@worthpoint.com and support@worthpoint.com February 20, 2016

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Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to
WorthPoint DATE February 20, 2016 email Page 3.

Plaintiff's Deposition Response Plaintiff's Evidence 000367 META DATA Page 3.
Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to
WorthPoint DATE February 20, 2016 META DATA FROM email Page 3

Plaintiff's Deposition Response Plaintiff's Evidence 000367 META DATA Page 4.
Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to
WorthPoint DATE February 20, 2016 META DATA FROM email Page 4.

Plaintiff's Deposition Response Plaintiff's Evidence 000367 META DATA Page 5.
Production of email from WorthPoint to to Plaintiff Annamarie Trombetta to
WorthPoint DATE February 20, 2016 META DATA FROM email Page 5.

Plaintiff's Deposition Response Plaintiff's Evidence 000368 Attachment #1
1972 Oil Painting Ad on worthpoint.com.

Plaintiff's Deposition Response Plaintiff's Evidence 000369 Attachment #2
"A. Trombetta Fake Signature" Copyrighted work licensed by WorthPoint".

Plaintiff's Deposition Response Plaintiff's Evidence 000370 Attachment #3
February 17, 2016 Google Listing of 1972 Oil Painting Ad on worthpoint.com.

Plaintiff's Deposition Response Plaintiff's Evidence 000371 Attachment #3
February 17, 2016 Google Listing of 1972 Oil Painting Ad on worthpoint.com.
ENLARGEMENT.

**Plaintiff's Deposition Response Plaintiff's Evidence 000372 WorthPoint
Evidence WP 000074**
February 20, 2016— PROOF OF attachments sent to WorthPoint as evidenced.

Plaintiff's Deposition Response Plaintiff's Evidence 000373 WorthPoint email
Production of Cancellation to WorthPoint.com membership subscription. Email sent
to Plaintiff's website email address annamarie@trombettaart.com. Date Febrary 29,
2016.

Plaintiff's Deposition Response Plaintiff's Evidence 000374
Production of Definition of advertisement.

Plaintiff's Deposition Response Plaintiff's Evidence 000375 Page 1
Production of Plaintiff's September 1, 2015 Receipt of Payment for 2015 Website
Design email confirmation from website Design Services—Page 1.

Plaintiff's Deposition Response Plaintiff's Evidence 000376 Page 2
Production of Plaintiff's September 1, 2015 Receipt of Payment for 2015 Website
Design email confirmation from website Design Services—Page 2.

Plaintiff's Deposition Response Plaintiff's Evidence 000377 Page 1
Production of worthpoint.com website links connected to the

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1972 Original Oil Painting Man With Red Umbrella four other linked to 1972 Oil/

Plaintiff's Deposition Response Plaintiff's Evidence 000378 Page 2

Plaintiff's Deposition Response Plaintiff's Evidence 000379 Page 1

Production of worth point.com website email for Investing in Worth Point dated April 14, 2016.

Plaintiff's Deposition Response Plaintiff's Evidence 000380 Page 2

Production of worth point.com website email for Investing in Worth Point dated April 14, 2016 UNSUBSCRIBE

Plaintiff's Deposition Response Plaintiff's Evidence 000381 Page 3

Production of worth point.com website email for Investing in Worth Point dated April 14, 2016 UNSUBSCRIBE SUCCESSFUL —SUBMIT

Plaintiff's Deposition Response Plaintiff's Evidence 000382

Production of 2003 Scott Goodwillie Recommendation to John O'Hearn Curator at Arnot Art Museum Re-Presenting Representation VI 2003 Exhibit.

Plaintiff's Deposition Response Plaintiff's Evidence 000383

Production of 2003 Scott Goodwillie Recommendation to John O'Hearn Curator at Arnot Art Museum Re-Presenting Representation VI 2003 Exhibit.

Plaintiff's Deposition Response Plaintiff's Evidence 000384

Production of 2003 Scott Goodwillie Recommendation to John O'Hearn Curator at Arnot Art Museum Re-Presenting Representation VI 2003 Exhibit Plaintiff's 2003 exhibition artwork Cardinal Numbers I from Arnot 2003 Catalog.

Plaintiff's Deposition Response Plaintiff's Evidence 000385

Production of 2003 Scott Goodwillie Recommendation to John O'Hearn Curator at Arnot Art Museum who wrote Plaintiff's Introduction to Plaintiff's 2003 catalog.

Plaintiff's Deposition Response Plaintiff's Evidence 000386

Production of worth point.com website email for Worth Point dated April 24, 2017.

Plaintiff's Deposition Response Plaintiff's Evidence 000387

Production of Plaintiff's April 24, 2019 filing with the Court Docket 22 Pages 1 to 38.

Plaintiff's Deposition Response Plaintiff's Evidence 000388

Production of WorthPoint's Evidence Terms of Use WP 000050 to WP 000061

Plaintiff's August 30, 2022 Deposition Document Extractions and Submission

PAGES : 43, 52, 57, 80, 82, 101, 103, 108, 109, 117, 118, 119, 120, 121, 122, 129, 130, 134, 135, 137, 138, 139, 140, 143, 144, 145, 148, 149, 153, 168, 169, 170, 171, 172,

Exhibit # 1

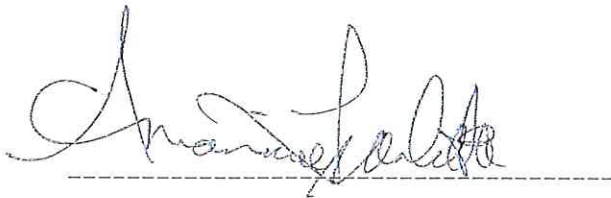
Page 6

173, 174, 175, 178, 179, 185, 186, 187, 188, 192, 193, 203, 205, 206, 207, 208,
PAGES : 209, 210, 214, 215, 216, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228,
230, 231, 232, 233, 247, 248, 249, 257, 258, 259, 264, 265, 266.

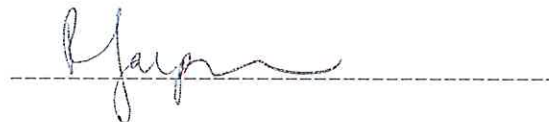
I, Annamarie Trombetta , state that I have read WorthPoint Corporation Deposition
and to the best of my ability submit the requests for the production of Supplemental
Documents to the best of my ability.

The undersigned, being first duly sworn. states that she has read the Deposition and
the content and that all corrections and responses are true tot he best of her
knowledge and belief.

PLEASE TAKE NOTICE, Plaintiff, Annamarie Trombetta reserves the right to amend
and/or supplement this response during the pendency of this action.



Annamarie Trombetta



Notary

Sworn to and subscribed before me this day 20th of October, 2022.



Exhibit # 2 Page 1

1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (12/01/2012) - Google Search

12/16/15, 7:57 PM

Google+ Search Images Maps Play YouTube News Gmail More ▾

artofannamarie@gmail.com ▾



1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombett



All Shopping Images Videos News More ▾ Search tools

9 results (0.79 seconds)

Original Oil Paintings - UGallery.com

www.ugallery.com/Buy-Original-Art ▾Shop from a Large Range of **Original Art**. Free Shipping on all Artwork!
Expertly Curated Pieces - 7 Day In Home Trial - Happy Clients Worldwide

The Showroom

Uncover Unique Pieces.
UGallery's Finest Art.

Staff Favorites

View Eye Catching Artwork.
From Our Discerning Staff

1972 Original Oil Painting Man With Red Umbrella Signed ...

www.worthpoint.com ▾ Worthopedia™ ▾1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta
yqz. Sold for: Start Free Trial or Sign In to see what it's worth. Item Category: ...
You've visited this page 3 times. Last visit: 12/15/15

Marilyn Monroe 1988 Vintage Michael Ochs Archive Chanel ...

www.worthpoint.com ▾ Worthopedia™ ▾1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta
yqz - Mustangs" Frank Rowland - Original Serigraph - LARGE DRAMATIC ...
You've visited this page many times. Last visit: 11/30/15

THOMAS KINKADE -KINCAID - WorthPoint

www.worthpoint.com ▾ Worthopedia™ ▾1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta
yqz - Handmade New Mexican Folk Art Church Birdhouse LARGE Lark Sedona ...

1789 bonnaterre original antique hand colored reptile ...

www.worthpoint.com ▾ Worthopedia™ ▾1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta
yqz - Handmade New Mexican Folk Art Church Birdhouse LARGE Lark Sedona ...

Annamarie Trombetta - Artist Info

www.trombettaart.com/info.html ▾2001. -Richmondtown Historic Museum S.I. NY "Plein Air Paintings of Staten Island"
1993. -Liederkrantz Club, NY "Paintings of Yeats'Country, Sligo Ireland ...
Missing: 1972 oil man red umbrella yqz 12 91 2012
You've visited this page 4 times. Last visit: 11/12/15

artist annamarie trombetta's imagery offers visionary ...

italianamericanmuseum.org/news/news_plein.html ▾Artist Annamarie Trombetta's "Central Park Imagery," a collection of en plein air ... Ms
Trombetta is an artist who has created works in printmaking, watercolor, oil ...
Missing: 1972 painting man red umbrella yqz 12 91 2012
You've visited this page 2 times. Last visit: 12/11/15

Annamarie Trombetta, Artist Interviewed by June Middleton ...

<https://www.youtube.com/watch?v=ufEQ3D3LWms>

Apr 29, 2015 · Uploaded by JuneMiddletonBrosney

Annamarie Trombetta, an artist who's art has been exhibited
around the world, has created works in oil ...
Missing: 1972 man red umbrella yqz 2012

Staten Island native's passionate love affair with Central ...

www.silive.com/entertainment/.annamarie_trombetta ▾ Staten Island AdvanceJan 12, 2015. Paintings, prints, drawings and photos by Annamarie Trombetta
resident is showing 60 works — etchings, oil paintings, watercolors, pastels ...
Missing: 1972 man red umbrella yqz 2012

You've visited this page 1 time. Last visit: 10/18/15

Ads

Original Art Gallery

www.zalista.com/ ▾Over 7000 Completely **Original Works**
Great Value. Buy Today. Save Big.

Ask Painting Appraisers

appraisals.justanswer.com/Painting ▾4.8 ★★★★★ rating for justanswer.com
An **Art Appraiser** Will Answer Now!
Questions Answered Every 9 Seconds.

Fabio Napoleoni Art

www.shopartcenter.com/ ▾Art Center Gallery your Fabio Store
Limited, **Originals** & Open Editions

Shop Fine Paintings

www.the-maac.com/paintings ▾Renowned Artist **Paintings** For Sale
Antique, Vintage, Contemporary
1050 2nd Ave #86, New York, NY
(212) 355-4400

Red Umbrellas

paticumbrellas.hayneedle.com/ ▾4.4 ★★★★★ rating for hayneedle.com
Don't Overpay for **Red Umbrellas!**
Discover More Options & Savings

Montclair Art Museum

www.montclairartmuseum.org/ ▾(973) 746-5555
Celebrating American Art
for 100 Years!

Famous Paintings in NYC

www.drawingcenter.org/painting ▾(212) 219-2168
Visit The Drawing Center in SoHo.
A Museum Dedicated to Drawings.
35 Wooster St. New York, NY

See your ad here ▸

See
page 1 of
2

1972 Original Oil Painting Man With Red Umbrella Signed Annamarie Trombetta yqz (12/01/2012) - Google Search

12/16/15, 7:57 PM

[PDF] 2011 Newsletter - Artists' Fellowship, Inc.

www.artistsfellowship.org/AFNewsletter2011.pdf ▼

Jul 1, 2011 - was immediately offered a one-man show, which was a sell-out. For the last several decades Mr. Stobart's maritime paintings and limited edition prints have ... 12 x 16 inches, oil on canvas. Dear Friends and ... Annamarie Trombetta. Jasmine Sewell ... The Library of Congress 2011 original print calendar ...

Missing: 1972 red umbrella yqz 01.

In order to show you the most relevant results, we have omitted some entries very similar to the 9 already displayed.
If you like, you can [repeat the search with the omitted results included](#).

○ [Use precise location](#) [Learn more](#)

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Exhibit #2
Page 2

See

Exhibit #3
Page 1

Annamarie Trombetta
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and Estate Auctions, Inc.
43-10 Crescent St. Ste. 1217 Long Island City, NY 11101

October 24, 2022

WorthPoint's Corporation Supplemental Rule 37 Responses to Plaintiff's Evidence

As a Pro Se litigant, I submitted the majority of my evidence before or on June 27, 2022. I was not aware that it was necessary to include all pages that relate to one document of evidence, provided I had such documents in my possession. If the Defendants would have brought this to my attention when I submitted my evidence in the beginning of the summer, the delay and redundancy in RE-producing documents could have been avoided. I have, on my own accord, added the full pages related to other documents in my evidence into this submission, which is relative to my case, beyond the Defendants' requests. Plaintiff's additions are at the end of this document.

Plaintiff's Responses to the following supplemental Requests

Plaintiff's Google Evidence 011—Submitted in full —

Plaintiff's Google Evidence 012—Submitted in full —

Plaintiff's Google Evidence 013—Submitted in full —

Plaintiff's Evidence 018 is Incorrect —Submitted in Full Inquiry about 016 017 018A

Plaintiff's Evidence 18 B —is Page 3 of 7 Pages. Page 4 to 7 had 3 pages with No Image logos.

Plaintiff's Evidence 021—Submitted in full —

Exhibit #2
Page 2

PLEASE NOTE CORRECTIONS AND ADDITIONS

CORRECTION —Plaintiff's -000037 is 18 pages and ends at -053 with 3 Visual Exhibits which were produced and submitted in Plaintiff's Deposition responses.

Plaintiff's Evidence 037 are in total 18 pages. It is a string of emails from Will Seippel to Plaintiff and vice versa—Submitted in full —

NEW ADDITION

Plaintiff found NEW Evidence which has Full 2 pages related to a Google print out dated January 20, 2016. The print out page was double sided, hence the possession of the two page production. Since Plaintiff's printer did not have the double sided feature, the January 20, 2016 print out was from another printer other than my own, possibly the Business Center in Plaintiff's Building or at the library or from the neighborhood copy center.

PLAINTIFF'S NEW EVIDENCE Page on 1972 Original Oil Painting Man With Red Umbrella DATE

January 20, 2016 - Plaintiff Evidence 000611 -Page 1 Plaintiff Evidence 000612 -Page 2

Plaintiff's Evidence 051 B —One Page

Plaintiff's Evidence 052 —One Page

Plaintiff's Evidence 053 —One Page

Plaintiff's Evidence 054 —One Page

Plaintiff's Evidence 055 —One Page

Plaintiff's Evidence 056 —One Page

Plaintiff's Evidence 057 —One Page

Plaintiff's Evidence 058 —One Page

ONCE AGAIN PLAINTIFF'S NEW EVIDENCE TWO PAGE PRINT OUT OF

1972 Original Oil Man With Red Umbrella SECOND PAGE HAS ADS.

Plaintiff Evidence 000611 -Page 1 Date January 20, 2016

Plaintiff Evidence 000612 -Page 2 Date January 20, 2016

Plaintiff's Evidence 059 —Submitted in full

Plaintiff's Evidence 060 —Submitted in full

Plaintiff's Evidence 062 —Submitted in full—62 Has NO page number on it.

Plaintiff's Evidence 059 —One Page

Plaintiff's Evidence 064 —Submitted Page 1 and Page 2 WorthPoint email sent to Plaintiff 10 Pages

Exhibit #3
Page 3

Plaintiff's Evidence 065 —One Page

Plaintiff's Evidence 066 —One Page

Plaintiff's Evidence 067 —One Page

Plaintiff's Evidence 068 —One Page

Plaintiff's Evidence 069 —As is.

Plaintiff's Evidence 75A —One Page

Plaintiff's Evidence 085 —This evidence is the Cover Photo of my Catalog—NO MISSING PAGES

Plaintiff's Evidence 087 —One Page

Plaintiff's Evidence 086 and 87 —Submitted in Full—This is Plaintiff's Catalog Biography

Plaintiff's Evidence 0140 to 141 —Submitted in Full

Plaintiff's Evidence 0146 —Submitted in Full—10 Pages due to ads.

Plaintiff's Evidence 0147 —Submitted in Full

Plaintiff's Evidence 0148 —Submitted in Full

Plaintiff's Evidence 0149 —Submitted in Full

Plaintiff's Evidence 0152 —Submitted in Full

PLEASE NOTE Plaintiff's Evidence 0161 and 162 —BATE STAMPED INCORRECTLY

Plaintiff's Evidence 161-Page 1 of 8

Plaintiff's Evidence 162-Page 2 of 8

Plaintiff's Evidence 162-Page 3 of 8

Plaintiff's Evidence 162-Page 4 -The other 4 pages were logos of "NO IMAGE AVAILABLE"

Plaintiff's Evidence 168 and 169 filed documents with the Court. I do not have documents 4 to 7.

Plaintiff's Evidence 173-Submitted in Full

Plaintiff's Evidence 179- to 184 -Page 4- Missing, known to Plaintiff—and was never produced.

Plaintiff's Evidence 191- Submitted in Full

Plaintiff's Evidence 193 to 194- Submitted in Full

Plaintiff's Evidence 195- Submitted in Full

Exhibit #3
Page 4

Plaintiff's Evidence 200—**DUPLICATE** see 173 and New Evidence March 24, 2022 same email.

Plaintiff's Evidence 202- **DUPLICATE**— **BATE STAMPED INCORRECTLY SEE Page 3 of 162**

Plaintiff's Evidence 217 and 218 are the same -- Submitted in Full

Plaintiff's Evidence 219-- Submitted in Full

Plaintiff's Evidence 223-- Submitted in Full

Plaintiff's Evidence 227-- Submitted in Full

Plaintiff's Evidence 229— MISTAKE IMAGE OF WISTERIA ARBOR MANDALA PAINTING
THERE ARE NO DOCUMENTS

Plaintiff's Evidence 268-- Submitted in Full

Plaintiff's Evidence 270-- DUPLICATE

Plaintiff's Evidence 271-- Submitted in Full

Plaintiff's Evidence 273-- Submitted in Full

Plaintiff's Evidence 274-- Submitted in Full

Plaintiff's Evidence 282-- Submitted in Full

Plaintiff's Evidence 291 -- Submitted in Full

Plaintiff's Evidence 295 to 296 -- Submitted in Full

Plaintiff's Evidence 297 -- Submitted in Full

Plaintiff's Evidence 313-314 -- PLEASE NOTE There are three page titled Marilyn Monroe 1988 Vintage Michael Ochs Archive Channel Perfume Poster. Plaintiff's Evidence 313 and -314 are out of order. Attached are the Plaintiff's three out of five pages. The two pages not produced were page 4 and 5 were nothing more than NO IMAGE AVAILABLE logos on both pages.

Plaintiff's Evidence 317— -- Submitted in Full

Plaintiff's Evidence 318 —Replacement Document

Plaintiff's Evidence 319—Four Pages Submitted in Full

Request No. 13 Response

Plaintiff is seeking Statutory Damages for the infringements to violations of The Visual Artist's Rights Act, Direct Copyright Infringement, the Digital Millennium

Copyright Act and the noted loss of the sale of artwork entitled Wisteria Arbor Mandala for \$8500.00.

Plaintiff is submitting my 2022 sales of artwork thus far. Plaintiff has been fully precluded from

Exhibit #3
Page 5

producing or selling my artwork in 2022 due to the overwhelming, consistent and repetitive demands from the Defendants related to this lawsuit. Plaintiff in 2017, when the fake posting was on the website of WorthPoint.com again in the fall 2016 and into 2017, Plaintiff put a credit freeze on my credit card. Additionally, Plaintiff in 2022 has not been able to produce or sell any of my artwork. At the beginning of January prior to the interaction with all attorneys, one sale of artwork dated January 12, 2022 for a 3 inch x 3 inch painting sold for \$750.00. This is the only income to date per the year 2022 and all my time has been drained due to this litigation. I NEVER did this painting and at present Defendants have not claimed that Plaintiff is not the artist. Defendants failed to identify the artist who painted Man With Red Umbrella. To protect my name and dissociate myself, my brand from this painting I had to file and pursue a lawsuit. This suit has thwarted, delayed and diverted my time and energy. The emotional financial and artistic damage is irreparable and permanent.

Request No. 18 Response Plaintiff has submitted all requested medical records, physical therapy appointments and doctor visits to both Defendants in April 2022. Plaintiff seeks clarity and what specifically the Defendants are seeking from my doctor. Plaintiff is requesting all items be in the form of a requests from the Defendants, so that all the requested information is clearly obtained and received. For example, in Plaintiff's August 30th Deposition, attorney Adam Bialek requested the electronic version of an email. Plaintiff printed out the electronic version of the meta data and also printed out another copy of the email. What Defendant required was the digital PDF file of the email and Plaintiff sent the digital documents. Additionally, Plaintiff reserves the right to give permission to the Defendants until the Plaintiff's Proposed Amended Complaint is GRANTED by the Court or Judge Cave /Abrams.

Plaintiff's Response to Defendants Rule 37 Demands

Electronic Signature

Annamarie Trombetta
175 East 96th Street
New York, New York, 10128

/s/ Annamarie Trombetta

Annamarie Trombetta

Exhibit # 3
Page 6

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New York, New York 10128
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Email atrombettaart@gmail.com

201 A.T.
October 24, 2022

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Adam Bialek Jana A. Slavina Farmer
Nicole Haimson 1133 Westchester Avenue
150 East 42nd Street White Plains, New York 10604
New York New York. 10017

Plaintiff's Response to Rule 37 Letter

I, Annamarie Trombetta, state that I have to the best of my ability submit the requests for the production of Supplemental Documents for Fact Discovery to the best of my ability.

The undersigned, being first duly sworn, states that she has submitted all Fact Discovery.

PLEASE TAKE NOTICE, Plaintiff, Annamarie Trombetta reserves the right to amend and/or supplement this response during the pendency of this action.

Date

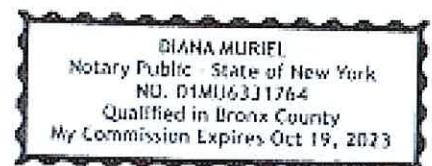
10/29/2022



Annamarie Trombetta



Notary



Plaintiff's
Deposition
Response

Exhibit
#4

Page 101

1 A. Trombetta

2 for the court in whatever form it appears.
3 Whether it is electronic as stored on your
4 computer or whether it was printed out and a
5 copy of the full printout.

6 When you get the transcript there will
7 be in the back a page that will have
8 requests. So it will make it a lot easier.

9 A. What would make it easier is for your
10 firm to confirm that I did not do this painting
11 because I have already given to both clients my
12 signature from 1972 which does not match.

13 Q. I do not believe that my client has
14 made any representations that you made this
15 painting or didn't make this painting.

16 A. Well --

17 Q. And if that is something you need we
18 can talk about it off the record, but for purposes
19 of today, I am trying to ask you questions about
20 the documents that you produced and see if we can
21 get the original version; okay?

22 A. Again, this is a period of seven years
23 and many filings. 274 or 5 to be exact.

24 Q. Are you intending to use this document
25 in proving your case?